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June 7, 2018

BY ECF

Magistrate Judge Steven L. Tiscione
United States District Court
Eastern District of New York
225 Cadman Plaza East
Room N324
Brooklyn, New York 11201

**Michelle Carter v. JPMorgan Chase Bank, N.A.
Case No. 17-539 (ARR) (ST)**

Dear Judge Tiscione:

We are counsel to defendant JPMorgan Chase Bank, N.A. in the above-referenced action. Attached is a copy of the transcript of your Honor's June 7, 2018 ruling regarding the videotaping of plaintiff's deposition.

Respectfully submitted,



Ronald M. Neumann

RMN:mzg
Attachment

cc: *To all counsel by ECF*

962944

1 UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK

2 Case No. 17-cv-539 (AMD) (SLT)

3 -----x

4 MICHELLE CARTER,
5 Plaintiff,

6 vs.

7 JPMORGAN CHASE BANK, N.A.,
8 Defendant.

9 -----x

10 JPMORGAN CHASE BANK, N.A.,
11 Third-Party Plaintiff,
12 vs.

13 DAHALEEL 1, INC. d/b/a ROCKAWAY
14 FARM DELI & GRILL, SALEM N.
15 AL-GEMSH, SALAH M. OMAIRAT, AMMAR
16 Y. AWAWDEH, et al.,
17 Third-Party Defendants.

18 -----x

19 VIDEOTAPED DEPOSITION OF

20 MICHELLE CARTER

21 New York, New York

22 Thursday, June 7, 2018

23 11:45 a.m.

24 Reported by:

25 Maureen Ratto, RPR, CCR

<p style="text-align: right;">Page 2</p> <p>1 * * *</p> <p>2</p> <p>3 Videotaped deposition of MICHELLE</p> <p>4 CARTER, held at the offices of Zeichner</p> <p>5 Ellman & Krause, LLP, 1211 Avenue of</p> <p>6 the Americas, New York, New York 10036</p> <p>7 pursuant to notice, before Maureen</p> <p>8 Ratto, Certified Court Reporter,</p> <p>9 License No. XI01165, Registered</p> <p>10 Professional Reporter, License No.</p> <p>11 817125, and Notary Public.</p> <p>12</p> <p>13 * * *</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 4</p> <p>1 A P P E A R A N C E S:</p> <p>2 Counsel for Third-Party Defendants</p> <p>3 Dahaleel 1, Inc., Salem N. Al-Gemsh:</p> <p>4 LAW OFFICES OF RAY BECKERMAN, P.C.</p> <p>5 108-18 Queens Boulevard</p> <p>6 Forest Hills, New York 11375</p> <p>7 718-544-3434</p> <p>8 BY: RAY BECKERMAN, ESQ.</p> <p>9 ray@beckermanlegal.com</p> <p>10</p> <p>11 Counsel for Third-Party Defendant</p> <p>12 Mukhter Omairat and Pickles & Olives,</p> <p>13 Inc.:</p> <p>14 THE VOLAKOS LAW FIRM, P.C.</p> <p>15 120 Bay Ridge Avenue</p> <p>16 Brooklyn, New York 11220</p> <p>17 718-836-4800</p> <p>18 BY: KONSTANTINOS VOLAKOS, ESQ.</p> <p>19 volakosesq@volakoslaw.com</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>
<p style="text-align: right;">Page 3</p> <p>1 A P P E A R A N C E S:</p> <p>2 Counsel for the Plaintiff:</p> <p>3 KUPILLAS, UNGER & BENJAMIN, LLP</p> <p>4 5 Penn Plaza</p> <p>5 New York, New York 10001</p> <p>6 212-655-9536</p> <p>7 BY: JEFFREY BENJAMIN, ESQ.</p> <p>8 jbenjamin@nyfraudlaw.com</p> <p>9</p> <p>10 Counsel for the Defendant- Third-Party</p> <p>11 Plaintiff:</p> <p>12 ZEICHNER ELLMAN & KRAUSE, LLP</p> <p>13 1211 Avenue of the Americas</p> <p>14 New York, New York 10036</p> <p>15 212-223-0400</p> <p>16 BY: RONALD M. NEUMANN, ESQ.</p> <p>17 rneumann@zeklaw.com</p> <p>18 DAVID HAMILTON, ESQ.</p> <p>19 dhamilton@zeklaw.com</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p>	<p style="text-align: right;">Page 5</p> <p>1 A P P E A R A N C E S:</p> <p>2 Counsel for Third-Party Defendant</p> <p>3 Salah Omairat:</p> <p>4 LAW OFFICE OF MICHAEL T. SUCHER</p> <p>5 26 Court Street Suite 2412</p> <p>6 Brooklyn, New York 11242</p> <p>7 718-522-1995</p> <p>8 BY: ANDREW SHABASSON, ESQ.</p> <p>9 nylawyer@aol.com</p> <p>10</p> <p>11 Counsel for Third-Party Defendant</p> <p>12 Ammar Y. Awawdeh:</p> <p>13 LAW OFFICE OF ALI NAJMI</p> <p>14 261 Madison Avenue</p> <p>15 New York, New York 10016</p> <p>16 212-401-6222</p> <p>17 BY: ALI NAJMI, ESQ.</p> <p>18 ali@najmilaw.com</p> <p>19 NATALIE MICELI</p> <p>20</p> <p>21 ALSO PRESENT:</p> <p>22 JOHN SONG, ESQ.</p> <p>23 In-House Counsel JPMorgan Chase Bank.</p> <p>24</p> <p>25</p>

2 (Pages 2 - 5)

<p style="text-align: right;">Page 6</p> <p>1 VIDEOGRAPHER: Good morning. 2 Here begins the video recorded 3 deposition of Michelle Carter taken 4 by the Defendant Third-Party 5 Plaintiff in the matters of 6 Michelle Carter plaintiffs versus 7 JPMorgan Chase Bank N A Defendant, 8 and JPMorgan Chase Bank N A 9 Third-Party Plaintiff against 10 Dahaleel 1, incorporated doing 11 business as Rockaway Farm Deli and 12 grill, et al Third-Party 13 Defendants, Civil Action No. 127 CV 14 00539 in the United States District 15 Court, Eastern District of New 16 York. 17 This deposition is proceeding 18 at Zeichner Ellman & Krause, LLP 19 1211 Avenue of the Americas, New 20 York, New York 10036 on Thursday, 21 June 7, 2018 at approximately 22 11:54. 23 My name is Howard Brodsky and 24 I'm the Legal Video Specialist in 25 association with David Feldman</p>	<p style="text-align: right;">Page 8</p> <p>1 Office of Michael Sucher, for Salah 2 Omairat, Third-Party Defendant. 3 MR. NAJMI: Law Office of Ali 4 Najmi, for Third-Party Defendant 5 Ammar Awawdeh. 6 MR. SONG: John Song, In-House 7 Counsel for JPMorgan Chase. 8 MR. HAMILTON: David Hamilton, 9 counsel for JPMorgan Chase. 10 VIDEOGRAPHER: Will the court 11 reporter please swear in the 12 witness. 13 * * * 14 MICHELLE CARTER, having 15 been first duly sworn according to law 16 by the Officer, testifies as follows: 17 DIRECT EXAMINATION BY NEUMANN: 18 Q. Ms. Carter, I have some 19 preliminary questions I'd like to ask 20 you. My name is Ronald Neumann. 21 Have you ever had your 22 deposition taken before in any matter? 23 A. Yes. 24 Q. And what matter was that? 25 A. With my lawyer.</p>
<p style="text-align: right;">Page 7</p> <p>1 worldwide incorporated with offices 2 located in Mineola, New York. The 3 court reporter is Maureen Ratto, in 4 association with David Feldman 5 worldwide incorporated will counsel 6 please state their appearances for 7 the record. 8 MR. NEUMANN: Ronald Neumann, 9 Zeichner, Ellman & Krause, LLP for 10 Defendant and Third-Party 11 Plaintiff, JPMorgan Chase. 12 MR. BENJAMIN: Jeffrey 13 Benjamin for the Plaintiff, 14 Kupillas, Unger & Benjamin. 15 MR. BECKERMAN: Ray Beckerman, 16 Law Office of Ray Beckerman, P.C. 17 attorneys for Third-Party 18 Defendants Dahaleel 1, Inc. and 19 Salem Al-Gemsh. 20 MR. VOLAKOS: Konstantinos 21 Volakos, the Volakos Law Firm P.C. 22 for Third-Party, Mukhter Omairat 23 and Pickles & Olives. 24 MR. SHABASSON: Andrew 25 Shabasson, S-h-a-b-a-s-s-o-n, Law</p>	<p style="text-align: right;">Page 9</p> <p>1 Q. Have you been a plaintiff or a 2 party in any other litigation, in which 3 your deposition was taken? 4 A. No. 5 Q. Did you ever sue either the 6 City of New York or the Transit 7 Authority? 8 A. Yes. 9 Q. And you were a plaintiff in 10 that action, you were the suing party in 11 that action? 12 A. Yes. 13 Q. And did you make a statement 14 under oath in that action? 15 A. Yes. 16 Q. Do you understand that in this 17 deposition today you're here testifying 18 under oath? 19 A. Yes. 20 Q. And that you have a legal 21 obligation to answer my questions 22 truthfully? 23 A. Yes. 24 Q. Is there any reason why you 25 cannot do that?</p>

3 (Pages 6 - 9)

<p style="text-align: right;">Page 10</p> <p>1 A. No.</p> <p>2 Q. Are you taking any substances</p> <p>3 that would interfere with your answering</p> <p>4 my questions truthfully today?</p> <p>5 A. No.</p> <p>6 MR. BENJAMIN: Objection to</p> <p>7 form. "Substances"? I mean I assume</p> <p>8 you mean --</p> <p>9 MR. NEUMANN: -- medication.</p> <p>10 A. No.</p> <p>11 Q. If you would like to take a</p> <p>12 break, please tell me and if there are no</p> <p>13 pending questions to be answered, you</p> <p>14 will able to take a break at your</p> <p>15 request. Do you understand that?</p> <p>16 A. Yes, I do.</p> <p>17 Q. If you do not understand a</p> <p>18 question, will you agree to ask for it to</p> <p>19 be repeated or for clarification?</p> <p>20 A. I sure will.</p> <p>21 Q. And then if you answer a</p> <p>22 question, is it fair to assume that</p> <p>23 you've heard and understood it?</p> <p>24 A. Yes.</p> <p>25 Q. Sometimes when answering a</p>	<p style="text-align: right;">Page 12</p> <p>1 A. Yes, I do. I want to know why</p> <p>2 it's happening.</p> <p>3 Q. Okay. It's happening at our</p> <p>4 request.</p> <p>5 A. On, just like that. Well, I</p> <p>6 don't like it. I don't like it. If you're</p> <p>7 all here there is no reason for a</p> <p>8 videotape.</p> <p>9 MR. BENJAMIN: Well, they've</p> <p>10 --</p> <p>11 Q. It's a matter of preserving</p> <p>12 the testimony.</p> <p>13 A. It's a matter of me liking it</p> <p>14 or not and wanting to do it and I don't,</p> <p>15 with no videotape.</p> <p>16 Q. Ms. Carter, have you ever been</p> <p>17 known by any other names?</p> <p>18 A. I'm not going on.</p> <p>19 MR. BENJAMIN: Let me speak to</p> <p>20 her first quickly. There is no</p> <p>21 pending question.</p> <p>22 MR. NEUMANN: There is a</p> <p>23 pending question.</p> <p>24 THE WITNESS: I'll tell</p> <p>25 everybody, this will be done</p>
<p style="text-align: right;">Page 11</p> <p>1 question you may think of documents that</p> <p>2 may help to give you -- to give a more</p> <p>3 accurate or complete answer and if that</p> <p>4 is the case you may request those</p> <p>5 documents and I will attempt to provide</p> <p>6 them. Do you understand that?</p> <p>7 A. Yes.</p> <p>8 Q. And if I ask you a question</p> <p>9 that could be answered with a "yes" or</p> <p>10 "no" response, will you agree to do that?</p> <p>11 A. Yes.</p> <p>12 Q. And at the conclusion of my</p> <p>13 questioning, other attorneys in the room</p> <p>14 will have the opportunity to ask</p> <p>15 questions, including your own lawyer. You</p> <p>16 understand that?</p> <p>17 A. Yes.</p> <p>18 Q. And the deposition today is</p> <p>19 being videotaped and you understand that?</p> <p>20 A. No.</p> <p>21 Q. You're being videotaped. There</p> <p>22 is a camera.</p> <p>23 A. I don't understand why.</p> <p>24 Q. But you understand that it's</p> <p>25 happening. Is that correct?</p>	<p style="text-align: right;">Page 13</p> <p>1 without a video camera or it won't</p> <p>2 be done by me.</p> <p>3 MR. BENJAMIN: Let me talk to</p> <p>4 her outside.</p> <p>5 VIDEOGRAPHER: Time is 11:59.</p> <p>6 We are off the record.</p> <p>7 (Discussion is held off the</p> <p>8 record.)</p> <p>9 VIDEOGRAPHER: The time is</p> <p>10 12:01. We are on the record.</p> <p>11 MR. BENJAMIN: After counsel's</p> <p>12 indication that this was being</p> <p>13 videotaped Ms. Carter has withdrawn</p> <p>14 that consent. She does not, as of</p> <p>15 today, want to proceed with a</p> <p>16 videotape.</p> <p>17 Of course, we're here, ready</p> <p>18 to proceed with a normal</p> <p>19 transcript. I didn't anticipate</p> <p>20 this, but she's not willing to</p> <p>21 consent to have a videotape at this</p> <p>22 time.</p> <p>23 MR. NEUMANN: We provided</p> <p>24 notice as required by the Federal</p> <p>25 Rules of Civil Procedure that this</p>

<p style="text-align: right;">Page 14</p> <p>1 deposition was going to be 2 videotaped, and you acknowledged 3 receiving that notice. 4 MR. BENJAMIN: I acknowledged 5 receiving the notice by e-mail and 6 I didn't have an issue and I 7 discussed this with her weeks ago. 8 MR. NEUMANN: It's not the 9 witness' choice as to whether a 10 deposition gets videotaped or not 11 and we're not waiving our right to 12 videotape her testimony. If 13 anything, this underscores the 14 reason why we need to have this 15 videotaped. 16 MR. BENJAMIN: Well, I don't 17 know if it underscores the reason, 18 but she just is not willing to 19 proceed with the videotape. I can 20 only tell you that. I've talked to 21 her and she's refusing to go 22 forward with the videotape. 23 MR. NEUMANN: Can we go off 24 the record? 25 VIDEOGRAPHER: The time is</p>	<p style="text-align: right;">Page 16</p> <p>1 appear at our office at 10 a.m. on 2 Monday, May 16 for her deposition 3 which we plan to videotape." 4 Exhibit D-3 is an e-mail chain 5 that includes my e-mail to 6 Mr. Benjamin dated Thursday, May 7 31, 2018 and I've highlighted the 8 fact that, "The deposition will be 9 videotaped and will take place at 10 our office beginning at 10 a.m." 11 and Mr. Benjamin's response was, 12 "Can we start at 11 a.m.?", to 13 which we all agreed. 14 Now, my colleague, David 15 Hamilton, will call the Magistrate 16 Judge. We're going to go off the 17 record and let the Magistrate Judge 18 know that we have a reporter 19 present if he wishes to be on the 20 record. 21 (Exhibit D-1, Notice of 22 Deposition of Michelle Carter, 23 dated February 13th, 2017, was 24 received and marked on this date 25 for identification.)</p>
<p style="text-align: right;">Page 15</p> <p>1 12:02. We are off the record. 2 (Discussion is held off the 3 record.) 4 MR. NEUMANN: As the 5 transcript will reflect, when I 6 asked the witness the first 7 question she objected to the 8 videotaping and refused to go 9 forward if the deposition was going 10 to be videotaped, which it is. The 11 Plaintiff, Ms. Carter is not in the 12 room now, but she's represented by 13 counsel. 14 At this time I am marking 15 three documents as Exhibits, 16 Defendant's Exhibit 1 is a Notice 17 of Deposition, it's dated February 18 13th, 2017 and on that notice it 19 says, "Take further notice that the 20 deposition shall be recorded by 21 stenographic means and videotaped." 22 D-2 is an e-mail that I sent 23 to Mr. Benjamin and copied all 24 counsel, in which I said, "Please 25 confirm that Plaintiff Carter will</p>	<p style="text-align: right;">Page 17</p> <p>1 (Exhibit D-2, e-mail 2 correspondence from Ronald Neumann, 3 Jeffrey Benjamin and copied all 4 counsel dated May 9, 2018 was 5 received and marked on this date 6 for identification.) 7 (Exhibit D-3, e-mail 8 correspondence from Ronald Neumann 9 to Jeffrey Benjamin dated May 9, 10 2018 was received and marked on 11 this date for identification.) 12 (Discussion is held off the 13 record.) 14 (Call is made to Magistrate 15 Judge Tiscione.) 16 MR. NEUMANN: We are on the 17 record, your Honor. This is Ronald 18 Neumann from Zeichner Ellman & 19 Krause. We represent the Defendant, 20 JPMorgan Chase in the case Michelle 21 Carter versus JPMorgan Chase. 22 We're in a deposition room 23 with Plaintiff's counsel present, 24 Chase counsel present and attorneys 25 for all the Third-Party Defendants</p>

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<p>Page 18</p> <p>1 who wish to be present, which is 2 multiple parties and we started to 3 go forward with the deposition and 4 when I asked my first substantive 5 question the witness refused to be 6 videotaped. As long as the 7 deposition is being videotaped she 8 refuses to answer any questions. 9 She's now exited the room. 10 I marked as exhibits the 11 Notice of Deposition, dated in 12 February of this year which 13 specifically provides notice that 14 the deposition will be videotaped 15 and I marked as exhibits e-mails, 16 two e-mails sent out in May to 17 Plaintiff's counsel and copied all 18 the Defendants' counsel, again, 19 reiterating that the deposition 20 will be videotaped. We're in the 21 room with the videographer who 22 initiated the video proceedings 23 until the Plaintiff refused to 24 continue. 25 THE COURT: All right. What is</p>	<p>Page 20</p> <p>1 fearful of it, being on -- just 2 having that video. There was -- I 3 think, we at a prior conference, we 4 talked about a YouTube video that 5 she was on. 6 THE COURT: Okay. 7 MR. BENJAMIN: And that is 8 sort of, I think, the basis for 9 some of her fear, but, you know, 10 I'm not contesting to notice by 11 counsel, it's just that I cannot -- 12 and I've talked to her now this 13 morning, probably three times 14 trying to get her to consent and I 15 cannot do it. 16 THE COURT: Well, I mean, I 17 don't see any basis for her not to 18 comply with the video deposition, 19 since it is noticed and I don't 20 really have a choice other than to 21 order her to go forward with the 22 deposition. 23 MR. BENJAMIN: Well, I mean, 24 is this something that we would 25 have to brief by motion? I hate to</p>
<p>Page 19</p> <p>1 going on with your client? 2 MR. BENJAMIN: Your Honor, 3 this is Plaintiff's counsel, 4 Jeffrey Benjamin for Michelle 5 Carter. 6 There is no issue of notice. 7 Counsel absolutely sent me those 8 notices he mentioned, and I did 9 notify Ms. Carter weeks ago when we 10 first tried to go to deposition. I 11 think it was two weeks ago. 12 Up until today we didn't think 13 it was going to be a problem, but 14 with the camera bearing down on her 15 today, she is simply refusing to go 16 forward with the videotape. 17 She is ready to go forward 18 with a standard deposition with a 19 standard transcript but she is -- 20 is simply refusing to proceed under 21 video despite my advice and despite 22 the notices we gave her. 23 THE COURT: Okay. The reason 24 she doesn't want to be videotaped? 25 MR. BENJAMIN: Yes. She's</p>	<p>Page 21</p> <p>1 open this up like that, but can we 2 proceed today without the video and 3 leave the issue of video later to 4 be brought back, I suppose? 5 I mean, it doesn't -- I'm just 6 sort of ruminating about this, but 7 I hate to -- I'm hoping the Court 8 doesn't order something that she 9 really is very much against her 10 will physically, you know. 11 THE COURT: If you want to 12 brief it I'm not going to do 13 deposition without video if it was 14 properly ordered as a video 15 deposition. I can order your client 16 to do the video deposition, or I 17 can say cancel the deposition, 18 Plaintiff is going to be charged 19 for any costs that the Defendants 20 incurred for today and if you want 21 to litigate the issue of whether or 22 not it should be a video 23 deposition, we can reconvene in the 24 future. I'll give you an 25 opportunity to file that motion,</p>

6 (Pages 18 - 21)

<p style="text-align: right;">Page 22</p> <p>1 but I mean, if she had an objection 2 to it she should have raised it 3 before the deposition. 4 MR. BENJAMIN: Okay. Well, let 5 me give her those two options and 6 -- but in any event, if we chose 7 option two, and we were to come 8 back, we would be subject to 9 videotaping by your order anyway. 10 Isn't that correct? We would have 11 to submit -- 12 THE COURT: I don't know if 13 there is a legitimate basis for 14 objecting to a video deposition. 15 I'll give you the opportunity to 16 raise it. I'm not aware of any off 17 the top of my head, but there could 18 be something. 19 I'll give you the opportunity 20 if you want to legally challenge 21 it, but, you know, as a general 22 matter, video depositions are 23 perfectly fine. So unless there is 24 some specific reason that you think 25 there is a legal basis for her</p>	<p style="text-align: right;">Page 24</p> <p>1 the Judge's opinion on the 2 Plaintiff's refusal to go forward 3 by videotape and the Plaintiff is 4 still refusing to go forward by 5 videotape and we're going to have 6 to exercise the option that the 7 judge gave us, option B, which was 8 to brief the issue by motion. It is 9 not something that I wanted and I 10 -- it's unfortunate, but that's 11 where I am now. 12 MR. NEUMANN: Does anyone want 13 to make a statement or respond 14 before we go off the record? And 15 your client understands that the 16 Judge ordered costs, the cost of 17 the reporter, the cost of the video 18 and any other costs that may be 19 appropriate? 20 MR. BENJAMIN: I'm not sure I 21 heard him say that, but whatever 22 he's ordering, I mean, if he's 23 ordering that, then we're going to 24 pay, but I'm not sure he ordered 25 that in that phone call, exactly,</p>
<p style="text-align: right;">Page 23</p> <p>1 objecting to the video deposition, 2 I would probably urge you to do 3 your best to convince her to just 4 do it. 5 MR. BENJAMIN: I'm going to go 6 back to her now with those two 7 options and see. I hope we don't 8 need any more of Your Honor's 9 intervention with this and waste 10 your time but I will try to, I'll 11 bring her back these options. 12 THE COURT: All right. I guess 13 see what you can do and if you need 14 my intervention just call chambers 15 again. 16 MR. NEUMANN: Thank very much 17 your Honor. 18 THE COURT: All right. 19 Good-bye. 20 (Discussion is held off the 21 record.) 22 MR. BENJAMIN: After 23 conferring with the Judge by 24 conference call just now, I have 25 brought back the Judge's ruling or</p>	<p style="text-align: right;">Page 25</p> <p>1 but I guess you'll send me a bill. 2 MR. NEUMANN: We're adjourned. 3 The time is 12:58 p.m. 4 VIDEOGRAPHER: The time is 5 12:58. We are on the record. 6 This concludes the video 7 recorded testimony of Michelle 8 Carter, taken by the Defendant, 9 Third-Party Plaintiff on Thursday, 10 June 7, 2018. The time is 12:58. We 11 are going off the record. 12 (The proceedings were 13 adjourned at 12:58 p.m.) 14 15 16 17 MICHELLE CARTER 18 19 Subscribed and sworn to before me 20 this ____ day of _____, 20__. 21 22 23 Notary Public 24 25</p>

7 (Pages 22 - 25)

Page 26	Page 28
<p>1 CERTIFICATE</p> <p>2 I, MAUREEN M. RATTO, a</p> <p>3 Registered Professional Reporter, do</p> <p>4 hereby certify that prior to the</p> <p>5 commencement of the examination,</p> <p>6 MICHELLE CARTER was sworn by me to</p> <p>7 testify the truth, the whole truth and</p> <p>8 nothing but the truth.</p> <p>9 I DO FURTHER CERTIFY that the</p> <p>10 foregoing is a true and accurate</p> <p>11 transcript of the proceedings as taken</p> <p>12 stenographically by and before me at</p> <p>13 the time, place and on the date</p> <p>14 hereinbefore set forth.</p> <p>15 I DO FURTHER CERTIFY that I am</p> <p>16 neither a relative nor employee nor</p> <p>17 attorney nor counsel of any of the</p> <p>18 parties to this action, and that I am</p> <p>19 neither a relative nor employee of such</p> <p>20 attorney or counsel, and that I am not</p> <p>21 financially interested in this action.</p> <p>22</p> <p>23 <i>Maureen Ratto</i></p> <p>24 MAUREEN M. RATTO, RPR</p> <p>25 License No. 817125</p>	<p>1 ERRATA SHEET</p> <p>2 VERITEXT LEGAL SOLUTIONS</p> <p>3 330 OLD COUNTRY ROAD</p> <p>4 MINEOLA, NY 11501</p> <p>5 800.727.6396</p> <p>6 CASE: CARTER vs. JPMORGAN CHASE BANK</p> <p>7 DEPOSITION DATE: JUNE 7, 2018</p> <p>8 DEPONENT: MICHELLE CARTER</p> <p>9 PAGE LINE(S) CHANGE REASON</p> <p>10</p> <p>11</p> <p>12</p> <p>13</p> <p>14</p> <p>15</p> <p>16</p> <p>17</p> <p>18</p> <p>19</p> <p>20</p> <p>21</p> <p>22</p> <p>23</p> <p>24</p> <p>25</p> <p>26</p> <p>27</p> <p>28</p> <p>29</p> <p>30</p> <p>31</p> <p>32</p> <p>33</p> <p>34</p> <p>35</p> <p>36</p> <p>37</p> <p>38</p> <p>39</p> <p>40</p> <p>41</p> <p>42</p> <p>43</p> <p>44</p> <p>45</p> <p>46</p> <p>47</p> <p>48</p> <p>49</p> <p>50</p> <p>51</p> <p>52</p> <p>53</p> <p>54</p> <p>55</p> <p>56</p> <p>57</p> <p>58</p> <p>59</p> <p>60</p> <p>61</p> <p>62</p> <p>63</p> <p>64</p> <p>65</p> <p>66</p> <p>67</p> <p>68</p> <p>69</p> <p>70</p> <p>71</p> <p>72</p> <p>73</p> <p>74</p> <p>75</p> 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Federal Rules of Civil Procedure

Rule 30

(e) Review By the Witness; Changes.

(1) Review; Statement of Changes. On request by the deponent or a party before the deposition is completed, the deponent must be allowed 30 days after being notified by the officer that the transcript or recording is available in which:

(A) to review the transcript or recording; and

(B) if there are changes in form or substance, to sign a statement listing the changes and the reasons for making them.

(2) Changes Indicated in the Officer's Certificate. The officer must note in the certificate prescribed by Rule 30(f)(1) whether a review was requested and, if so, must attach any changes the deponent makes during the 30-day period.

DISCLAIMER: THE FOREGOING FEDERAL PROCEDURE RULES ARE PROVIDED FOR INFORMATIONAL PURPOSES ONLY. THE ABOVE RULES ARE CURRENT AS OF SEPTEMBER 1, 2016. PLEASE REFER TO THE APPLICABLE FEDERAL RULES OF CIVIL PROCEDURE FOR UP-TO-DATE INFORMATION.

VERITEXT LEGAL SOLUTIONS
COMPANY CERTIFICATE AND DISCLOSURE STATEMENT

Veritext Legal Solutions represents that the foregoing transcript is a true, correct and complete transcript of the colloquies, questions and answers as submitted by the court reporter. Veritext Legal Solutions further represents that the attached exhibits, if any, are true, correct and complete documents as submitted by the court reporter and/or attorneys in relation to this deposition and that the documents were processed in accordance with our litigation support and production standards.

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